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November 21, 2024

**VIA ECF**

Honorable Harvey Bartle III, U.S.D.J.  
United States District Court for the  
Eastern District of Pennsylvania  
16614 U.S. Courthouse  
601 Market Street  
Philadelphia, Pennsylvania 19106

**Re: Atlas Data Privacy Corp., et al. v. DarkOwl, LLC, et al.**  
**Case No. 1:24-cv-10600**  
**Joinder in Defendants' Consolidated Motion to Dismiss and Request for Stay**

Dear Judge Bartle:

This firm represents Defendant DarkOwl, LLC ("DarkOwl") in the above-referenced matter, which was recently removed. DarkOwl respectfully requests to join the Consolidated Motion to Dismiss Brief (Doc. No 27) and Consolidated Reply (Doc. No 54), which were both previously filed in the action captioned as *Atlas Data Privacy Corporation, et al. v. Lightbox Parent, L.P., et al.*, Case No. 1:24-cv-04105-HB (collectively the "Consolidated Motion").

For the reasons set forth in the Consolidated Motion, DarkOwl respectfully requests that the Court grant the Motion and dismiss Plaintiffs' Complaint in this matter with prejudice. DarkOwl further respectfully requests that all other deadlines in this matter be stayed until a decision on the Consolidated Motion is rendered.

Respectfully submitted,

A handwritten signature in blue ink that reads "Kelly M. Purcaro".

KELLY PURCARO